

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Twanda Marshinda Brown, <i>et al.</i> , Plaintiffs, v. Lexington County, South Carolina, <i>et al.</i> , Defendants.	Civil Action No. 3:17-cv-01426-MBS
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**SUPPLEMENTAL DECLARATION OF TOBY J. MARSHALL IN SUPPORT OF
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Toby J. Marshall, declare as follows:

1. I am a member of the law firm of Terrell Marshall Law Group PLLC (TMLG), co-counsel of record for Plaintiffs in this matter. I am a member in good standing of the bar of the state of Washington, and I have been admitted in this matter pro hac vice. I respectfully submit this supplemental declaration in support of Plaintiffs' Motion for Summary Judgment. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. Attached hereto as Exhibit 60 are true and correct copies of excerpts from the May 6, 2021, Deposition of Edward Lewis. I took Mr. Lewis's deposition and received a copy of the certified transcript from the court reporter.

3. Attached hereto as Exhibit 61 are true and correct copies of excerpts from the March 9, 2022, Deposition of Judge Rebecca L. Adams, Vol. II (Adams Deposition, Vol. II). The deposition was taken by my co-counsel, Amreeta Mathai. I was present for the deposition and received a certified copy of the transcript from the court reporter.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 23rd day of May, 2022.

By: /s/ Toby J. Marshall
Toby J. Marshall